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Attorneys for Plaintiff,
MARTHA S. ESPIRITU

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARTHA S. ESPIRITU,
Plaintiff,

vs.

CAPITAL ONE, N.A., a national
association; PINTAR INVESTMENT
COMPANY RESIDENTIAL, L.P., a
Delaware limited partnership;
QUALITY LOAN SERVICE
CORPORATION, a California
corporation; PACIFIC COAST TITLE
COMPANY, a California corporation;
DOES I through X, and ROE
CORPORATIONS I through X,
inclusive,

Defendants.

Case No. 2:15-CV-01933-JAD-PAL

Removed From: Clark County, Nevada
District Court Case No. A-15-723597-
C, Dept. XXXI

**STIPULATION AND ORDER TO
EXTEND DISCOVERY
DEADLINES (FIRST REQUEST)**

The parties, by and through their undersigned counsel, stipulate and agree to amend the
current discovery scheduling order [Doc. 27], as follows:

1. Pursuant to LR 26-4, the parties stipulate and agree to the following:

a. At this time, no discovery has been completed. Plaintiff initially
filed her complaint in the Eighth Judicial District Court of
Nevada. On or about October 8, 2015, Capital One, N.A.
removed the action, and subsequently filed a dispositive motion
on October 22, 2015. The motion and opposition has been

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1 briefed, and a hearing has been set for February 29, 2016, at 11
2 a.m. before the Honorable Jennifer A. Dorsey. In addition,
3 Plaintiff has sought to consolidate this matter with another (Case
4 No. 2:15-cv-02146) since the case was removed.

5
6 b. Discovery for the entire case remains to be completed, including
7 depositions, and written discovery.

8
9 c. An order setting the initial discovery deadlines was entered on
10 January 28, 2016. After holding the 26(f) conference, the parties
11 agreed that extra discovery will be necessary, as all Defendants
12 are foreign entities, that may have witnesses in another state. In
13 addition, discovery has not been completed in anticipation of the
14 February 29, 2016 hearing.

15 2. Accordingly, the parties submit the following proposed schedule:

- 16 a. Last date to complete discovery: August 29, 2016.
17 b. Last date to amend pleadings and add parties: May 31, 2016.
18 c. Last date to file interim status report: June 30, 2016.
19 d. Last date to disclose experts pursuant to Fed. R. Civ. P. 26(a)(2):
20 June 30, 2016.
21 e. Last date to disclose rebuttal experts: July 29, 2016.
22 f. Last date to file dispositive motions: September 28, 2016.
23 g. Last date to file joint pretrial order: October 28, 2016.

24
25 ///

26 ///

h. All motions or stipulations to extend discovery shall be received
by: August 8, 2016.

IT IS SO STIPULATED AND AGREED.

Dated: February 16, 2016.

JOHNSON & GUBLER, P.C.

Greenberg Traurig, LLP

/s/ Russell G. Gubler

/s/ Eric W. Swanis

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ORDER

The foregoing is approved and shall be the scheduling order in the case.

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: March 3, 2016

Submitted By:
JOHNSON & GUBLER, P.C.

/s/ Russell G. Gubler

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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of JOHNSON & GUBLER, P.C. and that on this 18th day of February, 2016, I caused the above and foregoing STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES (FIRST REQUEST) to be served:

☒ Pursuant to Fed. R. Civ. P. 5(b) and Section IV of District of Nevada Electronic Filing Procedures, to be served **via electronic service**; or

☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada; or

☐ Pursuant to FRCP 5(b)(2)(D), to be sent **via facsimile**; or

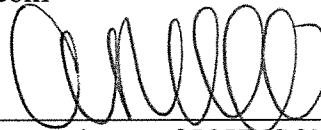
☐ to be hand-delivered;

to the attorney(s) listed below at the address and/or facsimile number indicated below:

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